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Proposed Counsel to the Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Binder & Binder – The National Social Security Disability Advocates (NY), LLC, Debtor. TAX ID Number 41-2191450	Chapter 11 Case No. 14-23728 (RDD)
In re: Binder & Binder - The National Social Security Disability Advocates LLC, Debtor. TAX ID Number 20-4018580	Chapter 11 Case No. 14-23729 (RDD)
In re: SSDI Holdings, Inc., Debtor. TAX ID Number 27-3223038	Chapter 11 Case No. 14-23730 (RDD)

<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (DC), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 46-5325265</p>	<p>Chapter 11</p> <p>Case No. 14-23731 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (LA), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 46-5488426</p>	<p>Chapter 11</p> <p>Case No. 14-23732 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (MD), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 32-0383760</p>	<p>Chapter 11</p> <p>Case No. 14-23733 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (MI), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 46-5478762</p>	<p>Chapter 11</p> <p>Case No. 14-23734 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (NC), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191460</p>	<p>Chapter 11</p> <p>Case No. 14-23735 (RDD)</p>

<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (NJ), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191454</p>	<p>Chapter 11</p> <p>Case No. 14-23736 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (OH), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 30-0707827</p>	<p>Chapter 11</p> <p>Case No. 14-23737 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (PA), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191453</p>	<p>Chapter 11</p> <p>Case No. 14-23738 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (TX), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191458</p>	<p>Chapter 11</p> <p>Case No. 14-23739 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates VA, LLC,</p> <p>Debtor.</p> <p>TAX ID Number 38-3887875</p>	<p>Chapter 11</p> <p>Case No. 14-23740 (RDD)</p>

<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (WA), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 27-0410225</p>	<p>Chapter 11</p> <p>Case No. 14-23741 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (CO), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 27-1640945</p>	<p>Chapter 11</p> <p>Case No. 14-23742 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (CT), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 30-0750206</p>	<p>Chapter 11</p> <p>Case No. 14-23743 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (FL), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191455</p>	<p>Chapter 11</p> <p>Case No. 14-23744 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (GA), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 27-0564768</p>	<p>Chapter 11</p> <p>Case No. 14-23745 (RDD)</p>

<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (IL), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191457</p>	<p>Chapter 11</p> <p>Case No. 14-23746 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (AZ), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 27-4645887</p>	<p>Chapter 11</p> <p>Case No. 14-23747 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (CA), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 41-2191456</p>	<p>Chapter 11</p> <p>Case No. 14-23748 (RDD)</p>
<p>In re:</p> <p>Binder & Binder - The National Social Security Disability Advocates (MO), LLC,</p> <p>Debtor.</p> <p>TAX ID Number 36-4742108</p>	<p>Chapter 11</p> <p>Case No. 14-23749 (RDD)</p>
<p>In re:</p> <p>The Rep for Vets LLC,</p> <p>Debtor.</p> <p>TAX ID Number 90-0806421</p>	<p>Chapter 11</p> <p>Case No. 14-23750 (RDD)</p>

In re: National Veterans Disability Advocates LLC (dba The Rep for Vets LLC), Debtor. TAX ID Number 27-1647468	Chapter 11 Case No. 14-23751 (RDD)
In re: The Social Security Express Ltd., Debtor. TAX ID Number 55-0834960	Chapter 11 Case No. 14-23752 (RDD)

**DEBTORS' MOTION FOR ENTRY OF AN ORDER PURSUANT TO RULE 1015(b)
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
DIRECTING THE JOINT ADMINISTRATION OF THEIR CHAPTER 11 CASES**

Binder & Binder – The National Social Security Disability Advocates (NY), LLC, *et al.*, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), submit this motion (the “Motion”), for entry of an order substantially in the form annexed hereto (the “Order”), administratively consolidating their respective Chapter 11 Cases solely for procedural purposes and providing for joint administration thereof. In support of the Motion, the Debtors respectfully state as follows:

JURISDICTION, VENUE AND STATUTORY PREDICATE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 105(a) of title 11 of the United States Code (as amended, the “Bankruptcy Code”) and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

BACKGROUND

3. On December 18, 2014 and continuing through on December 19, 2014 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”).

4. The Debtors are operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the filing of this Motion, no trustee, examiner or committee has been requested or appointed.

RELIEF REQUESTED

5. By this Motion, the Debtors seek entry of an order directing (a) the joint administration of the Debtors’ Chapter 11 Cases for procedural purposes only and (b) parties in interest to use a consolidated caption (the “Proposed Caption”), as set forth in Exhibit A hereto, to indicate that any filed motion, application or other pleading relates to the jointly administered bankruptcy cases of “Binder & Binder – The National Social Security Disability Advocates (NY), LLC, *et al.*”

6. The Debtors also request that the following notation (or a substantially similar notation) be entered on the docket of each of the Debtors’ cases (other than the Binder & Binder – The National Social Security Disability Advocates (NY), LLC case) to reflect the joint administration of these Chapter 11 Cases:

An order has been entered in this case directing the procedural consolidation and joint administration of these Chapter 11 Cases of in accordance with Rule 1015(b) of the Federal Rules of *Binder & Binder – The National Social Security Disability Advocates (NY), LLC* and its direct and indirect debtor subsidiaries. The docket in Chapter 11 Case No. 14-23728 should be consulted for all matters affecting this case.

7. The Debtors further request that the Court: (a) find that the Proposed Caption satisfies the requirements of section 342(c)(1) of the Bankruptcy Code in all respects; (b) authorize the Debtors to utilize a combined service list for the jointly administered cases; and (c) authorize combined notices be sent to creditors of the Debtors' estates and other parties-in-interest, as applicable. Consistent with the foregoing, the Debtors also seek authority to file the monthly operating reports required by the United States Trustee Operating Guidelines and Financial Reporting Requirements (together, the "Guidelines") for the Southern District of New York (the "U.S. Trustee") on a consolidated basis with a summary schedule listing disbursements by Debtor in order to calculate fees owed to the United States Trustee on a Debtor by Debtor basis.

ARGUMENT

8. Bankruptcy Rule 1015(b) provides that "[i]f... two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates." The Debtors are "affiliates" as that term is defined under section 101(2) of the Bankruptcy Code. Accordingly, this Court is authorized to grant the relief requested herein.

9. The joint administration of the Debtors' Chapter 11 Cases will permit the Clerk of the Court to utilize a single general docket for all of the above-referenced cases and to combine notices to creditors of the Debtor's respective estates and other parties in interest. Entering an order directing joint administration of the Debtors' Chapter 11 Cases will avoid the need for duplicative notices, motions, applications and orders, thereby saving time and expense that otherwise would be required to administer individual cases. Because these cases involve thousands of creditors, the entry of an order of joint administration will: (a) significantly reduce

the volume of pleadings that otherwise would be filed with the Clerk of this Court; (b) render the completion of various administrative tasks less costly; and (c) minimize the number of unnecessary delays associated with the administration of twenty-five separate chapter 11 cases.

10. The rights of the respective creditors of the Debtors will not be adversely affected by the proposed joint administration of these Chapter 11 Cases because this Motion requests only administrative, and not substantive, consolidation of the Debtors' estates. In fact, creditors will benefit from the reduced costs that will result from the joint administration of these Chapter 11 Cases.

11. Joint administration will simplify supervision of the administrative aspects of these Chapter 11 Cases by the U.S. Trustee—a task that would pose significant and unnecessary burdens absent joint administration.

12. Pursuant to section 342(c)(1) of the Bankruptcy Code "[i]f notice is will required to be given by the debtor to a creditor . . . such notice shall contain the name, address, and last four digits of the taxpayer identification number of the debtor." The Proposed Caption incorporates all of the required information by reference and, therefore, complies with the terms of section 342(c) of the Bankruptcy Code.

13. Finally, filing the monthly operating reports required by the U. S. Trustee Guidelines on a consolidated basis will further administrative economy efficiency without prejudice to any party in interest. The Debtors submit that the reports would accurately reflect the Debtors' consolidated business operations and financial affairs. Joint administration of the Debtors' cases is, thus, appropriate here.

NOTICE

14. Notice of this Motion has been given to (i) Counsel to Capital One Bank, N.A., McCarter & English, LLP, Four Gateway Center, 100 Mulberry St., Newark, New Jersey 07102, Attn: Joseph Lubertazzi, Jr. (jlubertazzi@mccarter.com); (ii) Counsel to US Bank National Association, Katten Muchin Rosenman LLP, 525 West Monroe Street, Chicago, Illinois 60661, Attn: Kenneth J. Ottaviano (kenneth.ottaviano@kattenlaw.com); (iii) Stellus Capital Investment Corporation, Moore & Van Allen PLLC, 100 North Tryon Street, Suite 4700, Charlotte, North Carolina 28202, Attn: Stephen E. Gruendel (stevegruendel@mvalaw.com); (iv) the Debtors' twenty largest unsecured creditors; (v) the Office of the United States Trustee for the Southern District of New York; (vi) the Internal Revenue Service; and (vii) those parties who have filed a notice of appearance and request for service of pleadings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is required.

NO PRIOR REQUEST

15. No previous motion for the relief sought herein has been made to this or to any other court.

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form annexed hereto, granting joint administration of the Chapter 11 Cases and grant such other and further relief as the Court may deem just and proper.

Dated: December 18, 2014

Respectfully submitted,

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Binder & Binder – The National Social Security
Disability Advocates (NY), LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 14-23728 (RDD)

Jointly Administered

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: (1) Binder & Binder - The National Social Security Disability Advocates (NY), LLC (1450); (2) SSDI Holdings, Inc. (3038); (3) Binder & Binder - The National Social Security Disability Advocates LLC (8580); (4) Binder & Binder - The National Social Security Disability Advocates (AZ), LLC (5887); (5) Binder & Binder - The National Social Security Disability Advocates (CA), LLC (1456); (6) Binder & Binder - The National Social Security Disability Advocates (CO), LLC (0945); (7) Binder & Binder - The National Social Security Disability Advocates (CT), LLC (0206); (8) Binder & Binder - The National Social Security Disability Advocates (FL), LLC (1455); (9) Binder & Binder - The National Social Security Disability Advocates (GA), LLC (4768); (10) Binder & Binder - The National Social Security Disability Advocates (IL), LLC (1457); (11) Binder & Binder - The National Social Security Disability Advocates (MD), LLC (3760); (12) Binder & Binder - The National Social Security Disability Advocates (MO), LLC (2108); (13) Binder & Binder - The National Social Security Disability Advocates (NJ), LLC (1454); (14) Binder & Binder - The National Social Security Disability Advocates (NC), LLC (1460); (15) Binder & Binder - The National Social Security Disability Advocates (OH), LLC (7827); (16) Binder & Binder - The National Social Security Disability Advocates (PA), LLC (1453); (17) Binder & Binder - The National Social Security Disability Advocates (TX), LLC (1458); (18) Binder & Binder - The National Social Security Disability Advocates VA, LLC (7875); (19) Binder & Binder - The National Social Security Disability Advocates (WA), LLC (0225); (20) Binder & Binder - The National Social Security Disability Advocates (LA), LLC (8426); (21) Binder & Binder - The National Social Security Disability Advocates (MI), LLC (8762); (22) Binder & Binder - The National Social Security Disability Advocates (DC), LLC (5265); (23) The Rep for Vets LLC (6421); (24) National Veterans Disability Advocates LLC (dba The Rep for Vets LLC) (7468); and (25) The Social Security Express Ltd. (4960) (together, the "Debtors").